

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

MDL No. 16-2738 (FLW) (LHG)

*THIS DOCUMENT RELATES TO ALL CASES*

**PLAINTIFFS' MOTION TO SEAL EXHIBITS TO PLAINTIFFS' STEERING  
COMMITTEE'S OBJECTION TO SPECIAL MASTER'S LETTER OPINION ON  
DEFENDANT IMERYS TALC AMERICA'S CLAWBACK REQUEST**

Pursuant to Rule 5(d) of the Federal Rules of Civil Procedure and Local Civil Rules 5.3(c) and 7.1, Plaintiffs, by and through Plaintiffs' Steering Committee, hereby move to file **Exhibits 1, 2, and 3** to Plaintiffs' Steering Committee's Objection to the Special Master's Letter Opinion on Defendant Imerys Talc America's Clawback Request (Dkt. No. 8141) under seal, and to redact those portions of the Objection that quote or otherwise reference the contents of the sealed exhibits.

Imerys Talc America, Inc. has asserted the marital communications privilege with respect to the emails at issue (**Exhibit 1**), and **Exhibits 2 and 3** contain and/or quote relevant portions of the emails. Therefore, Plaintiffs move the Court for leave to submit the exhibits to the foregoing Objection and portions of the Objection that quote or reference the emails under seal.

A proposed form of Order has been simultaneously submitted.

Dated: November 20, 2018

Respectfully submitted,

s/ Warren T. Burns  
Warren T. Burns  
Burns Charest LLP  
900 Jackson Street, Suite 500  
Dallas, Texas 75202

Telephone: 469.904.4550  
Email: wburns@burnscharest.com

s/ Michelle A. Parfitt  
Michelle A. Parfitt  
ASHCRAFT & GEREL, LLP  
4900 Seminary Road, Suite 650  
Alexandria, VA 22311  
Telephone: 703-931-5500  
Email: mparfitt@ashcraftlaw.com

s/ P. Leigh O'Dell  
P. Leigh O'Dell  
BEASLEY, ALLEN, CROW,  
METHVIN, PORTIS&MILES, PC  
218 Commerce Street  
Montgomery, AL 36104  
Telephone: 334-269-2343  
Email: leigh.odell@beasleyallen.com

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

s/ Warren T. Burns  
Warren T. Burns  
Burns Charest LLP  
900 Jackson Street, Suite 500  
Dallas, Texas 75202  
Telephone: 469.904.4550  
Email: wburns@burnscharest.com